

Message

From: James Dotchin [jdotchin@ndep.nv.gov]
Sent: 12/21/2018 11:28:49 PM
To: 'Steve Clough' [steve.clough@nert-trust.com]; Fong, Alison [fong.alison@epa.gov]; James Carlton Parker [jcarltonparker@ndep.nv.gov]; Weiquan Dong [wdong@ndep.nv.gov]
CC: Andrew Steinberg [andrew.steinberg@lepetomaneinc.com]; Brian Loffman [brian.loffman@lepetomaneinc.com]
Subject: RE: NERT 2018 Priorities

Steve,

Thank you for sending these schedule modifications that we discussed during the Stakeholder Roundtable. We will modify the 2018 Priorities to add additional footnotes when we complete the final reviews at the end of December. If NERT has any specific priorities for the list in 2019 please let us know and we will include them as well. Either way we will be in touch to set up a call to go over the 2019 items in January after NDEP and US EPA has a chance to go over them.

Have a great Christmas,
JD

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From: Steve Clough <steve.clough@nert-trust.com>
Sent: Friday, December 21, 2018 3:20 PM
To: James Dotchin <jdotchin@ndep.nv.gov>; Alison Fong <fong.alison@epa.gov>; James Carlton Parker <jcarltonparker@ndep.nv.gov>; Weiquan Dong <wdong@ndep.nv.gov>
Cc: Andrew Steinberg <andrew.steinberg@lepetomaneinc.com>; Brian Loffman <brian.loffman@lepetomaneinc.com>
Subject: NERT 2018 Priorities

JD / Alison / Carlton / Weiquan,

Per our conversation during the pre-meeting for the Stakeholder Remedial Investigation presentation, NERT has prepared this summary of schedule modifications to the 2018 Milestones established for NERT by NDEP and EPA.

H2 Bio Reactor Pilot Test Start (APT Water)

The technical roundtable was conducted on November 7, 2018. Given concerns expressed by MET the work plan has yet to be submitted to NDEP. NERT proposes rescheduling the work plan submittal due date from December 31, 2018 to January 31, 2018.

Installation of NERT COPC Treatment Plant on TIMET Site

NERT has been working diligently to design, permit, and construct the Treatment System Extension and has been in regular communication with both TIMET and NDEP regarding the project. While acknowledging that the Trust will work to ensure system readiness as early in 2019 as possible, NERT proposes rescheduling the completion date from December 31, 2018 to December 31, 2019 due to the external variables that could impact the project timeline.

SWF Area Bioremediation Treatability Study Report

As requested by NDEP, NERT has completed 3 rounds of carbon donor injections and post-injection monitoring in ongoing. The original report submittal date of September 30, 2018 assumed only 2 injection events would occur. Accordingly NERT proposes rescheduling this date to March 31, 2019 to accommodate the additional time necessary to complete the third injection event, post-injection monitoring, and report preparation. NERT has received NDEP's approval of Treatability Study Modification No. 6 and will continue to provide updates via the monthly progress reports.

Phase 6 Groundwater Model

As requested by NDEP, NERT will submit the Phase 6 groundwater model (including the fate and transport model) after all data collected as part of the RI have been integrated into the model. Based on the current schedule for completing planned RI field work NERT proposes rescheduling the due date from December 31, 2018 to August 31, 2019. This change should allow sufficient time to integrate any data collected during the Phase 2 groundwater investigation in the Downgradient Study Area.

Implement Independent Cost Evaluations

As discussed during the Mid-Year Check-In Meeting, NERT has the independent cost evaluation team in place and ready to review the field implementation cost estimates. This team was secured before the scheduled date of June 30, 2018 and they have reviewed the treatability study work plans. However, since the Phase 1 site characterization data evaluation, bench scale laboratory testing, and detailed design of each treatability study is still underway, the cost evaluations will be completed at the appropriate time in the near future when the required information is available for review. Nevertheless, NERT does not anticipate that this process will delay completion of the Feasibility Study.

Completed Tasks

As I'm sure you are aware, NERT has completed a large number of the 2018 priorities, many ahead of schedule, as summarized below.

- Monitor and Report Mass Flux at identified transects semi-annually by June 30, 2018 – completed early with submission of the Semi-Annual Remedial Performance Memorandum submitted on April 30, 2018 and in the Annual Remedial Performance Report submitted on November 9, 2018.
- AP-5 Solution Treatment (Decision/Options) by April 30, 2018 – completed early with data transmittal on April 6, 2018 (via email) and the decision meeting on April 26, 2018.
- AP-5 Pond Closure (Contingent on item #5) by December 31, 2018 – completed early with field activities completed in early October 2018.

- Unit 4/5 Investigation Data Submittal (DVSR/EDD) by July 31, 2018 – completed on-time with the DVSR/EDD submission on July 31, 2018.
- Phase III RI Field Work Completed by December 31, 2018 – all field activities specified in the NDEP-approved Phase 3 RI Work Plan were completed in mid-November in advance of the revised date of December 31, 2018 (previously agreed to following the Mid-Year Check-In Meeting). Subsequent RI modifications No. 4 and 5 will be completed in the first quarter of 2019.
- In-situ Chrome Treatability Study Report Submitted by March 30, 2018– completed early with the report submission on March 22, 2018.
- Vacuum Enhanced Recovery Pilot Report Submitted by September 30, 2018 – completed early with the report submission on July 12, 2018.
- Unit 4 In-Situ Bio Field Work Start by June 30, 2018 – completed early with the pre-design investigation field activities beginning in May 2018.
- Las Vegas Wash Bio Treatability Study Field Work Start by December 31, 2018 – completed early with the pre-design investigation field activities beginning in March 2018.
- Galleria Rd ZVI Field Work Start by June 30, 2018 – completed early with the pre-design investigation field activities beginning in April 2018.
- Galleria Rd In-situ Bio Field Work Start by June 30, 2018 – completed early with the pre-design investigation field activities beginning in March 2018.
- Greener Cleanups – Submit Work Plan with anticipated costs, expected benefits, and timeframes to implement selected BMP's in 2018 by June 30, 2018 – completed on-time with the submission of the work plan on June 29, 2018.

Ongoing and On Track

- Continue optimized management of the GWETS to maintain existing hydraulic capture by December 31, 2018 – NERT has maintained the capture zones are documented in the Annual Remedial Performance Report submitted on November 9, 2018.
- GWETS Up-time >95% by December 31, 2018 – as of October 30, 2018 NERT has maintained the uptime in 2018 at 95.8%. The treatment plants have only been down for preventative maintenance throughout 2018.
- Weir Treatment Plant to operate without TSS or Perchlorate Excursion Measured at Outfall (After delivery at SNWA Flange) by December 31, 2018 – although there may be some small future discharges as part of decommissioning activities analytical data has demonstrated (as documented in our quarterly DMRs) that no excursions occurred during active operations of the Weir Dewatering Treatment Plant.

We look forward to discussing 2019 priorities with NDEP and US EPA in January. 2019 will continue to be a very busy year as we prepare the RI Report for OU-1 and OU-2, continue to execute field work in OU-3, and implement a variety of treatability studies throughout the NERT RI Study Area.

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